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10 UNITED STATES BANKRUPTCY COURT  
11 DISTRICT OF OREGON

12 In re

13 Van's Aircraft, Inc.,

14 Debtor.  
15

Case No. 23-62260-dwh11

**STIPULATED MOTION FOR ENTRY  
OF STIPULATED ORDER  
EXTENDING DEADLINE TO OBJECT  
TO CLAIM NO. 559 (CLIFFORD KING)**

16 Van's Aircraft, Inc. ("Van's") and Clifford King move this Court for entry of a stipulated  
17 order extending the deadline for Van's to object to Claim No. 559 of Clifford King ("Claim  
18 559") to August 28, 2024, as set forth below, and state as follows:

19 1. The Court entered its Order Confirming Debtor's Plan of Reorganization Pursuant  
20 to 11 U.S.C. § 1191(b) [ECF No. 143] on May 16, 2024 (the "Plan"). The Plan became effective  
21 on June 1, 2024 (the "Effective Date").

22 2. The parties been working diligently to resolve Claim 559. Van's expects that the  
23 conferral process will be completed shortly, and that Claim 559 may be resolved, mostly likely  
24 without need for the Court's claim objection process.

25 3. Van's certifies that, for the reasons set forth herein, the requested extension is in  
26 good faith, Van's appropriately used the prior time, and that the continuance is being requested

1 at the earliest time practical. Van's and Mr. King have agreed to stipulate to an extension of the  
2 claim objection deadline, as it pertains to Claim 559, to August 28, 2024.

3 4. Attached hereto as **Exhibit 1** is a proposed Stipulated Order Extending Deadline  
4 to Object to Claim No. 559 (Clifford King).

5 5. WHEREFORE, the parties pray this Court enter the Stipulated Order Extending  
6 Deadline to Object to Claim No. 559 (Clifford King).

7 DATED: August 14, 2024.

8 TONKON TORP LLP

9 By /s/ Timothy J. Conway

10 Timothy J. Conway, OSB No. 851752  
11 Michael W. Fletcher, OSB No. 010448  
Ava Schoen, OSB No. 044072  
Attorneys for Debtor

12 IT IS SO STIPULATED:

13 TONKON TORP LLP

14 By /s/ Timothy J. Conway

15 Timothy J. Conway, OSB No. 851752  
16 Michael W. Fletcher, OSB No. 010448  
Ava Schoen, OSB No. 044072  
Attorneys for Debtor

By /s/ Clifford King

Clifford King  
Claimant

# **EXHIBIT 1**

## **Proposed Form of Stipulated Order**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF OREGON

In re

Van's Aircraft, Inc.,

Debtor.

Case No. 23-62260-dwh11

**STIPULATED ORDER EXTENDING  
DEADLINE TO OBJECT TO CLAIM  
NO. 559 (CLIFFORD KING)**

THIS MATTER having come before the Court upon the Stipulated Motion for Entry of Stipulated Order Extending Deadline to Object to Claim No. 559 (Clifford King) [ECF No. \_\_\_\_] (the "Motion"), and the Court having reviewed the Motion and otherwise being duly advised in the premises; NOW, THEREFORE,

IT IS HEREBY ORDERED that the deadline for Van's Aircraft, Inc. to object to Claim No. 559 (Clifford King) is extended to August 28, 2024.

###

I certify that I have complied with the requirements of LBR 9021-1(a).

Presented by:

TONKON TORP LLP

By \_\_\_\_\_  
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IT IS SO STIPULATED:

TONKON TORP LLP

By \_\_\_\_\_  
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Michael W. Fletcher, OSB No. 010448  
Ava Schoen, OSB No. 044072  
Attorneys for Debtor

By \_\_\_\_\_  
Clifford King  
Claimant